

Christopher S. Marchese (SBN 170239)
marchese@fr.com
Tyler R. Train (SBN 318998)
train@fr.com
FISH & RICHARDSON P.C.
633 West Fifth Street, 26th Floor
Los Angeles, CA 90071
Tel: (213) 533-4240 / Fax: (858) 678-5099

Oliver Richards (SBN 310972)
orichards@fr.com
John-Paul Fryckman (SBN 317591)
fryckman@fr.com
Fish & Richardson P.C.
12860 El Camino Real, Suite 400
San Diego, CA 92130
Tel: (858) 678-5070

Additional Counsel Listed on Signature Page

Attorneys for Defendants
DISH Network Corporation, et al.

IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

ENTROPIC COMMUNICATIONS, LLC.

Plaintiff.

V.

DISH NETWORK CORPORATION;
DISH NETWORK L.L.C.; DISH
NETWORK SERVICE L.L.C.; AND
DISH NETWORK CALIFORNIA
SERVICE CORPORATION.

Defendants.

Case No. 2:23-cv-1043-JWH-KES

**APPLICATION FOR LEAVE TO
FILE UNDER SEAL DEFENDANTS'
ANSWER, AFFIRMATIVE
DEFENSES, AND FIRST AMENDED
COUNTERCLAIMS TO
PLAINTIFF'S COMPLAINT
PURSUANT TO L.R. 79-5.2.2**

District Judge: Hon. John W. Holcomb
Magistrate Judge: Hon. Karen E. Scott

1 DISH NETWORK CORPORATION;
2 DISH NETWORK L.L.C.; DISH
3 NETWORK SERVICE L.L.C.; DISH
4 NETWORK CALIFORNIA SERVICE
CORPORATION; AND DISH
TECHNOLOGIES, L.L.C.

5 Counter-Claimants,

6 v.

7 ENTROPIC COMMUNICATIONS,
8 LLC; MAXLINEAR, INC.; AND
MAXLINEAR COMMUNICATIONS
9 LLC,

10 Counter-Defendants.

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 Pursuant to Civil Local Rules 79-5.2.2(b), Defendants DISH Network
2 Corporation; DISH Network L.L.C.; Dish Network Service L.L.C.; and Dish Network
3 California Service Corp. (collectively, “DISH” or “Defendants”) file this Application
4 for Leave to File Under Seal the following documents:

- 5 • Portions of Defendants’ Answer, Affirmative and Additional Defenses,
6 and First Amended Counterclaims to Plaintiff Entropic
7 Communications, LLC’s (“Plaintiff” and “Entropic”) Complaint for
8 Patent Infringement (“Amended Counterclaims”);
9 • Portions of Attachment A the redline of Defendants’ Amended
10 Counterclaims; and
11 • Exhibits 1-2 & 4-20 in Support of the Defendants’ Amended
12 Counterclaims.

13 The above documents contain and discuss material that DISH, Plaintiff
14 Entropic, Counter-Defendants MaxLinear, Inc. (“MaxLinear”), and third-party
15 Multimedia over Coax Alliance (“MoCA”) (collectively, the “Designating Parties”)
16 deem to be confidential, sensitive business information that they have designated as
17 “Restricted—Attorneys’ Eyes Only” under the Protective Order in this case. *See*
18 Richards Decl. ¶¶ 2-6.

19 Pursuant to Local Rule 79-5.2.2(b), Defendants have conferred with the
20 Designating Parties about possible redactions that would eliminate or minimize the
21 need for filing under seal. *Id.* ¶ 7. Based on the responses received while conferring
22 with counsel, DISH files the present request to file documents under seal. *Id.*
23 Defendants are also filing a proposed order granting this Application.

1 Dated: January 31, 2024

FISH & RICHARDSON P.C.

2 By: /s/ Oliver Richards

3 Oliver Richards (SBN 310972)
4 orichards@fr.com
5 John-Paul Fryckman (SBN 317591)
fryckman@fr.com
6 Fish & Richardson P.C.
12860 El Camino Real, Suite 400
7 San Diego, CA 92130
Tel: (858) 678-5070

8 Christopher S. Marchese (SBN 170239)
9 marchese@fr.com
10 Tyler R. Train (SBN 318998)
train@fr.com
11 633 West Fifth Street, 26th Floor
Los Angeles, CA 90071
12 Tel: (213) 533-4240

13 Ruffin B. Cordell (*pro hac vice*)
cordell@fr.com
14 Richard A. Sterba (*pro hac vice*)
sterba@fr.com
15 Ralph A. Phillips (*pro hac vice*)
rphillips@fr.com
16 Adam R. Shartzer (*pro hac vice*)
shartzer@fr.com
17 Michael J. Ballanco (*pro hac vice*)
ballanco@fr.com
18 Taylor C. Burgener (SBN 348769)
burgener@fr.com
19 FISH & RICHARDSON P.C.
20 1000 Maine Ave., SW, Suite 1000
Washington, DC 20024
21 Tel: (202) 783-5070

22
23 David M. Barkan (SBN 160825)
barkan@fr.com
24 FISH & RICHARDSON P.C.
25 500 Arguello Street, Suite 400
Redwood City, CA 94063
26 Tel: (650) 839-5070

27 Ashley A. Bolt (*pro hac vice*)
bolt@fr.com
28 FISH & RICHARDSON P.C.

1 1180 Peachtree Street NE, 21st Floor
2 Atlanta, GA 30309
3 Tel: (404) 892-5005

4 Aaron P. Pirouznia (*pro hac vice*)
5 pirouznia@fr.com
6 FISH & RICHARDSON P.C.
7 1717 Main Street, Suite 5000
Dallas, TX 75201
Tel: (214) 292-4073
Fax: (214) 747-2091

8 Attorneys for Defendants
9 DISH Network Corporation, et al.

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28